

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,

Plaintiff,

vs.

THE LAMPO GROUP, LLC, ET AL.,

Defendant.

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Case No. 3:21-cv-00923

JURY DEMAND

PLAINTIFF'S NOTICE OF 30(b)(6) DEPOSITION

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6) the deposition of Defendant **The Lampo Group, LLC's** 30(b)(6) Designated Representative will be taken before a duly qualified reporter on September 28, 2022 beginning at 10 am Central Standard Time, at 1720 West End Avenue, Nashville, TN 37202. The deposition will be recorded by audio, audiovisual, or stenographic means pursuant to the rules.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), The Lampo Group, LLC is required to designate and fully prepare one or more person(s) with knowledge concerning the following designated matters, who have consented to testify on its behalf, and whom Defendant will fully prepare to testify regarding the following designated matters and to such information that is known or reasonably available to the organization:

1. The factual basis for Defendant's affirmative defenses.
2. Defendant's responses and responsive documents to any discovery requests in this matter.

3. All facts considered by Defendant when making the decision to hire Plaintiff.
4. All facts considered by Defendant when making the decision to terminate Plaintiff.
5. All persons making either recommendation or decision that Plaintiff be terminated, when that recommendation/decision was made and when it was finalized, their role in such recommendation/decision, any investigation performed by any person relied upon when making the recommendation/decision, all facts considered when making the recommendation/decision, and all documents that support, refer, reflect or explain such recommendation/decision.
6. Any and all investigations conducted by Defendant or on Defendant's behalf related to Plaintiff's employment and/or his performance.
7. All communications between employees of Defendant occurring between May 2019 and August 2020 related to its decision to terminate Plaintiff.
8. Defendant's COVID-19 response.
9. Plaintiff's job duties.
10. Plaintiff's requests for accommodation.
11. Plaintiff's complaints of harassment and/or discrimination throughout his employment.
12. Plaintiff's compensation and benefits from Defendant from 2019 through 2020.
13. Plaintiff's performance reviews by Defendant from 2019 through 2020.
14. Any corrective action issued to Plaintiff by Defendant from 2019 through 2020.
15. Defendant's discipline and/or corrective action policies for its employees from 2019 until 2020.
16. The contents of Plaintiff's personnel file.

17. The identity of all persons who provided factual information used in Defendant's response to the THRC investigation into this matter.

18. The documents submitted to the THRC in response to Plaintiff's charge of discrimination and the factual information contained therein, and the identity of any person involved in the creation of said documents.

19. All lawsuits and/or complaints by Defendant's employees whether formal or informal alleging violations of Title VII of the Civil Rights Act made against Defendant from 2019 through 2020 including the name, caption or any identifying number of any cause of action, documents reflecting any complaint or lawsuit, the nature of the lawsuit or complaint, any investigation made as a result of the lawsuit/complaint (including what actions were taken, what facts were discovered, the complete process of the investigation, and the result of the investigation), and the resolution of such cause of action or investigation.

20. All documents provided through discovery in this matter.

21. General description of the legal hold process in this matter including all details of that policy and specific steps that were taken in this case to implement the hold.

22. Timing of issuing the legal hold and to whom it was issued and the substance of the legal hold communication.

23. Process for tracking and follow-up with the legal hold sources to ensure understanding and compliance with the hold process.

24. With regard to the legal hold process and electronic material, whether there are any auto-delete processes in place in the organization and, if so, what steps were taken to disable them and when were those steps taken.

25. Methods used to cull relevant ESI prior to review (including de-duping, date range exclusion and other mechanisms, as well as the search criteria for inclusion or exclusion in review and how the search criteria was developed (including potential use of subject matter experts to flush out search terms).

26. The total volume of ESI collected, reviewed, and produced.

27. The identify of any documents referring to the Plaintiff or this lawsuit in any way whatsoever and the identity of all custodians of said documents.

28. Any response provided in discovery in this matter.

DOCUMENTS REQUESTED DUCES TECUM

Pursuant to Federal Rule of Civil Procedure 30(b)(2), Defendant shall produce documents:

1. Any and all documents used, referenced or referred to in response to Plaintiff's Notice of 30(b)(6) deposition that have not already been produced. This includes all documents which deponent will give testimony regarding at the deposition.

Respectfully Submitted,

THE EMPLOYMENT & CONSUMER LAW GROUP,

/s/ Lauren Irwin

JONATHAN STREET, BPR NO. 021712

LAUREN IRWIN, BPR No. 034833

Attorneys for Plaintiff

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Nashville, TN 37203

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was served via electronic mail this 25th day of August, 2022 to the following:

Leslie Goff Sanders (TN #18973)

Daniel Crowell (TN #31485)

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/s/ Lauren Irwin

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